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July 23, 2019

Mark E. Dottore  
Receiver  
Dream Center Education Holdings  
2344 Canal Road  
Cleveland, OH 44113

Dear Mr. Dottore:

The purpose of this letter is to reiterate my request for copies of any electronic mail documents or electronic mail archives in your possession from employees, corporate officers, directors, and owners of South University of Ohio LLC, South University, Dream Center Education Holdings LLC, Argosy Education Group LLC, and DC South University of Ohio LLC. Additionally, I request all documentation or information you have compiled while investigating:

- Bonus payments made by Dream Center Education Holdings;<sup>1</sup>
- Missing, improperly expended, or fraudulently obtained federal funds;<sup>2</sup>
- Other misconduct or unlawful behavior related to this case.

Subsequent to my request on April 12, 2019, staff of the U.S. House of Representatives Committee on Education and Labor has been in regular communications with your office regarding the transfer of the above referenced emails. A review of the sub-set of responsive documents you shared clarified important aspects of the Committee's inquiry. However, this review and subsequent investigative activities raise questions that require access to the remaining records responsive to this request.

Please provide the requested documents by August 5, 2019 to Benjamin Sinoff who can be reached at [benjamin.sinoff@mail.house.gov](mailto:benjamin.sinoff@mail.house.gov). Should you have any inquiries, please call 202-225-3725.

Sincerely,

A handwritten signature in blue ink that reads "Bobby Scott".

**ROBERT C. "BOBBY" SCOTT**  
Chairman

Mr. Mark Dottore

July 23, 2019

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<sup>1</sup> See *Digital Media Solutions, LLC v. South University of Ohio, LLC et al.*, Case No. 1:19-cv-145, Dkt. 333-3 at 25 (N.D. Ohio Jan.18, 2019) (indicating that Receiver is investigating bonus payments made to Dream Center executives

<sup>2</sup> See *Digital Media Solutions, LLC v. South University of Ohio, LLC et al.*, Case No. 1:19-cv-145, Dkt. 68 at 1-2 (N.D. Ohio Jan.18, 2019) (“As a result of [Receiver’s] investigation it has come to the Receiver’s attention that there may be irregularities in the method and manner used by some or all of the pre-Receiver’ship Dream Center Entities to request Title IV funding, in particular with respect to draw downs of accelerated student funding (“Student Stipends”). It appears that amounts improperly requested by the pre-Receiver’ship Dream Center Entities and then advanced by the United States Department of Education were not remitted to students, either before the submission of the request for payment (as was required), or after the money was received by the pre-Receiver’ship Dream Center Entity. It also appears that when the funding was received by the pre-receivership Dream Center Entities, it was used to pay their operating expenses.”)